

Blaine H. Bortnick
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Creditor, pro se

Hearing Date and Time:
January 9, 2020 at 2:00 p.m.

Objection Deadline:
January 2, 2020

UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK

-----X		
In re	:	Chapter 11
	:	
LIDDLE & ROBINSON, L.L.P.,	:	Case No. 19-12346 (SHL)
	:	
Debtor	:	(Jointly Administered with Case No.
-----	:	19-10747)

**OBJECTION TO MOTION BY DEBTOR LIDDLE & ROBINSON, L.L.P. FOR ENTRY
OF AN ORDER ESTABLISHING DEADLINE FOR FILING PROOFS OF CLAIM AND
APPROVING THE FORM AND MANNER OF NOTICE THEREOF**

Blaine H. Bortnick, a creditor in this action, hereby objects to the motion of Debtor Liddle & Robinson, L.L.P. and respectfully states as follows:

1. The undersigned does not object to the establishment of a deadline for the filing of proofs of claim or the form and manner of notice thereof with two exceptions. Debtor requests that “Proofs of Claim not be required to be filed by creditors wishing to assert Claims against the Debtor” of the following types: (a) “Any Debtor having a Claim against another Debtor” (i.e. Jeffrey L. Liddle against Liddle & Robinson), and (b) “Any holder of an equity interest in the Debtor with respect to the ownership interest of such equity interest” (i.e. any equity claim of Jeffrey L. Liddle against Liddle & Robinson).¹

¹ The proposed exception for equity claims is vague, and it may appear to nevertheless require the filing of such claims. Accordingly, the objection to the equity claim issue is made in the abundance of caution.

2. Jeffrey Liddle should be held to the same deadline as any other creditor to file a proof of claim with respect to any claim he has against Liddle & Robinson. Until it is known what claims Mr. Liddle may assert, the ultimate resolution of this matter will unnecessarily be delayed.²

Dated: New York, New York
December 26, 2019



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² I recognize that the newly appointed trustee may not have sufficient time prior to the established bar date to assert claims against Jeffrey Liddle individually. Accordingly, this objection applies only to the Liddle & Robinson bankruptcy matter (i.e. Mr. Liddle as an individual must file a proof of claim with respect to any claim he has individually against the firm, but the firm as represented by the trustee is not so required at this time).